

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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April 9, 2003

BY E-MAIL AND
FIRST CLASS U.S. MAIL

Amy G. Rabinowitz, Esq.
Massachusetts Electric
25 Research Drive
Westborough, MA 01582-0099

Re: Massachusetts Electric Company and Nantucket Electric Company, D.T.E. 03-20

Dear Ms. Rabinowitz:

Enclosed is the First Set of Information Requests by the Department of Telecommunications and Energy to Massachusetts Electric Company and Nantucket Electric Company regarding the captioned matter. Please submit copies of the Company's responses to the information requests to the Department by 5:00 p.m., April 23, 2003.

Should you have any questions please contact me at (617) 305-3762. Thank you for your prompt attention to this matter.

Sincerely,

Jody Stiefel
Hearing Officer

Enc.
cc: Mary Cottrell, Secretary

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. 03-20

**FIRST SET OF INFORMATION REQUESTS TO
MASSACHUSETTS ELECTRIC COMPANY AND NANTUCKET ELECTRIC
COMPANY**

The Department of Telecommunications and Energy ("Department") submits to Massachusetts Electric Company ("MECo") and Nantucket Electric Company ("Nantucket") (collectively "Companies") the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request refers to the Companies' 2002 service quality ("SQ") reports filed on March 3, 2003. We shall refer to MECo's 2002 SQ report as MECo Filing; we shall refer to Nantucket's 2002 SQ report as Nantucket Filing; and we shall refer to the Companies' 2002 SQ reports collectively as Companies' Filings.
2. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer. Provide electronic versions of all your responses including all calculations and worksheets. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed **but no later than April 23, 2003**.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or their witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "**historical data**" refers to data for the years **1992 through 2001**.
5. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
6. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills,

checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

7. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
8. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit four (4) copies of the responses to Jody M. Stiefel, Hearing Officer, and (2) copies to Glenn Shippee, Rates and Revenue Requirements Division.

Requests

- DTE 1-1 Refer to the MECo Filing at §§ I-1, II-6. Please explain how the Company calculated Consumer Division Cases. Did the Company include only residential customers? If not, please provide. Did the Company perform its calculation using “Consumer Division Cases per 1000 Customers” or did the Company use raw frequencies of cases?
- DTE 1-2 Refer to the MECo Filing at § I-1. Does the Company compile data regarding Non-emergency Answering? If yes, please provide; if no, explain.
- DTE 1-3 Refer to the MECo Filing at § I-2. Please provide additional information regarding the Company’s 465 customer service guarantee payments, explaining for what reason payments were made and how the Company made the program known to employees and customers.
- DTE 1-4 Refer to the MECo Filing at § II-1. Please provide the calculations conducted by the Company to derive the \$2,968,125 penalty amounts for SAIDI and SAIFI.
- DTE 1-5 Refer to the MECo Filing at § II-1. Please provide the calculations conducted by the Company to derive the \$799,766 and \$248,121 offset totals for Telephone Answering and for Consumer Cases, respectively.
- DTE 1-6 Please provide MECo’s annual staffing number, identifying union and non-union members, management and non-management, for the last ten years.
- DTE 1-7 Refer to the Nantucket Filing at §§ I-1, II-6. Please explain how the Company calculated Consumer Division Cases. Did the Company include only residential customers? If not, please provide. Did the Company perform its calculation using “Consumer Division Cases per 1000 Customers” or did the Company use raw frequencies of cases?

- DTE 1-8 Refer to the Nantucket Filing at § I-1. Does the Company compile data regarding Non-emergency telephone answering? If yes, please provide; if no, explain.
- DTE 1-9 Refer to the Nantucket Filing at § I-2. Please provide additional information regarding the Company's four customer service guarantee payments, explaining for what reason payouts were made and how the Company made the program known to employees and customers.
- DTE 1-10 Refer to the Nantucket Filing at § II-1. Please provide the calculations conducted by the Company to derive the \$16,057 penalty amount for SAIDI.
- DTE 1-11 Refer to the Nantucket Filing at II-1. Please provide the calculations conducted by the Company to derive the \$9,515 offset amount for Telephone Answering.
- DTE 1-12 Please provide Nantucket's annual staffing number, identifying union and non-union members, management and non-management, for the last ten years.
- DTE 1-13 For each of the SQ measures that the Companies did not meet their benchmark, please detail any necessary initiatives the Companies have implemented to improve its performance.
- DTE 1-14 For each of the SQ measures that the Companies did not meet their benchmark, please detail any conditions under which the Companies operated that would have influenced the results the Companies achieved.
- DTE 1-15 Please detail the internal audits that have been conducted to assure the accuracy of Companies' data. If internal audits have not been performed, please indicate the Companies' plans to perform such audits.
- DTE 1-16 Please explain how the Companies recorded and measured the following SQ measures:
- (a) Telephone Answer Factor;
 - (b) Emergency Answering;
 - (c) Service Appointments Kept;
 - (d) Meter Reads;
 - (e) Bill Adjustments;
 - (f) Lost Time Accident Rate;
 - (g) Response to Odor Calls;
 - (h) Restricted Work Day Rate.

In your response, indicate if the Companies faced any recording and measurement issues and how they were resolved. Provide documentation to support your answer.

DTE 1-17 Please explain why ten years historical data is not available for the following SQ penalty measures and reporting requirements: Telephone Answering; Accidents; Meter Reads; Restricted Work Day; and CAIDI

DTE 1-18 Please explain how the Companies have complied with the requirement in Service Quality of Massachusetts Electric Company and Nantucket Electric Company, D.T.E. 01-71B (2002) that the Companies provide DTE 99-84 data in its annual SQ report. Please include an explanation of how the Companies' Filings meet that requirement regarding customer surveys.